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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

DRUCILLA COOPER,

Plaintiff,

v.

UNITED AIRLINES, Inc. and Does 1 through
10,

Defendants.

Case No.: 13-CV-02870-JSC

**NOTICE OF MOTION AND
PLAINTIFF'S MOTION TO ENLARGE
TIME PURSUANT TO CIVIL L.R. 6-3**

TO DEFENDANT AND ITS COUNSEL OF RECORD:

Plaintiff Drucilla Cooper (“Plaintiff” or “Cooper”), through her undersigned counsel, hereby moves the Court to enlarge time as to Plaintiff’s Objections to Defendant United Airlines, Inc.’s (“Defendant” or “United”) Bill of Costs. (Dkt. # 85). This Motion is made pursuant to Civil L.R. 6-3, and is based upon this Motion, the Declaration of Dow W. Patten, and the Proposed Order. As described below, good cause exists for the Court to enlarge the due date for Plaintiff’s Objections by 14 days .

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I. RELIEF REQUESTED

Plaintiff respectfully requests that the Court enlarge the due date for Cooper's Opposition to United's Bill of Costs by 14 days—i.e., until April 21, 2015.

II. FACTUAL BACKGROUND

On March 24, 2015, United filed its Bill of Costs (Dkt. # 85), the opposition for which is due today, April 7, 2015. *See* Civil L.R. 7-3(a); Patten Decl., ¶ 2. The parties attempted, albeit unsuccessfully, to comply with their meet and confer requirements prior to Plaintiff filing an Opposition to the Bill of Costs. Civil L.R. 54-2(b); Patten Decl., ¶ 3. Plaintiff was unable to obtain a stipulation to extend time for her Opposition, because of Plaintiff's counsel's travel schedule. *Id.*

III. LAW & ARGUMENT

A. THERE IS GOOD CAUSE TO ENLARGE TIME.

Civil Local Rules 6-3(a)(1) requires Plaintiff to state specific reasons to enlarge time. Here, good cause exists to enlarge the due date of Plaintiff's Opposition to Defendant's Bill of Costs by 14 days to permit the parties sufficient time to meet and confer, and reduce or completely obviate the need for further motion practice. Patten Decl., ¶ 4. Furthermore, Plaintiff's economic ability to pay any allowable costs will require a declaration, which Plaintiff has been unable to complete due to Plaintiff's counsel's travel schedule. Patten Decl., ¶ 5.

B. PLAINTIFF'S REQUEST RELIEF WILL NEITHER PREJUDICE DEFENDANT NOR IMPACT THE COURT'S PRETRIAL SCHEDULE.

This enlargement of time will have no effect on the case schedule since this Court has already granted summary judgment to Defendant and entered judgment. (Dkt. # 83-84); Patten Decl., ¶ 7.

1 **IV. CONCLUSION**

2 Based on the foregoing, Plaintiff respectfully requests that this Court enlarge time for
3 Cooper's Opposition to Defendant's Bill of Costs by 14 days.

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5 Respectfully submitted this 7th day of April, 2015

SMITH PATTEN

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7 /s/ DOW W. PATTEN
8 SPENCER F. SMITH
9 DOW W. PATTEN
10 DAMIEN B. TROUTMAN
11 Attorneys for Plaintiff
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